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March 15, 2004

Mary L. Cottrell, Secretary
Department of Telecommunications and Energy
One South Station, 2nd Floor
Boston, Massachusetts 02110

Re: D.T.E. 03-121, NSTAR Electric Standby Rate Tariffs

Dear Secretary Cottrell:

On March 15, 2004, NSTAR Electric received a motion from The Energy Consortium ("TEC"), dated March 12, 2004, requesting an extension of time for the filing of TEC's pre-filed testimony in the above-referenced case. On the last day before TEC's direct case is due, TEC seeks an extension of eight business days, until March 26, 2004, for the filing of its direct case. In order to achieve an expedited resolution to TEC's motion, NSTAR Electric responds briefly below.¹

The existing schedule requires all intervenors to file their direct cases no later than March 16, 2004. All parties (including TEC) participated in the development of the procedural schedule at the prehearing conference held on February 10, 2004.² This schedule was developed in the context of a specific statutory framework that requires all parties, including NSTAR Electric, to proceed in an orderly basis toward evidentiary hearings, party initial briefs and reply briefs, and ultimately a Department Order by July 30, 2004.

In its motion, TEC claims that it filed discovery requests to NSTAR Electric on February 27, 2004 and March 5, 2004, and, on this sole basis, TEC argues that it has not received timely responses to its information requests. However, in violation of the Hearing Officer's directives in this case, TEC failed to e-file its discovery, using only

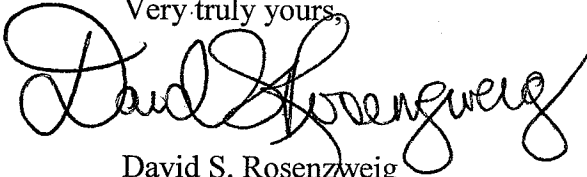
¹ NSTAR Electric reserves its right to supplement this response in the future, if appropriate. NSTAR Electric also incorporates by reference herein its opposition to similar motions filed by the New England Distributed Generation Coalition and the Western Massachusetts Industrial Customer Group relating to separate requests for modifications to the approved procedural schedule.

² TEC did not seek to appeal the procedural schedule established by the Hearing Officer in this case.

regular mail. Accordingly, NSTAR Electric did not receive these discovery sets until March 1, 2004, and March 8, 2004, respectively.³ Based on these receipt dates, NSTAR Electric's responses are due today, March 15, 2004 (which will be timely filed by the close of business), and March 22, 2004. Accordingly, the timing of TEC's receipt of discovery responses is wholly the result of its own failure to properly file discovery requests (and its decision to wait until the end of the discovery process to propound discovery).⁴

Accordingly, NSTAR Electric respectfully requests that the Department deny TEC's motion for an extension of time to file its direct case.

Thank you for your attention to this matter.

Very truly yours,

David S. Rosenzweig

Enclosures

cc: John Cope-Flanagan, Hearing Officer
William Stevens, Hearing Officer
Service List

³ It bears noting that the last day to propound discovery was March 8, 2004.

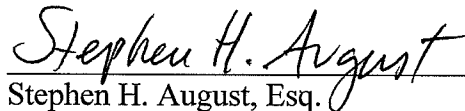
⁴ NSTAR Electric's records indicate that TEC has not made use of emailing, faxing, couriers or other means of facilitating the expedited exchange of materials during this proceeding.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

_____)	
Boston Edison Company)	
Cambridge Electric Light Company)	D.T.E. 03-121
Commonwealth Electric Company)	
d/b/a NSTAR Electric)	
_____)	

CERTIFICATE OF SERVICE

I certify that I have this day served the foregoing documents upon the service list
in the above-docketed proceeding in accordance with the requirements of 220 C.M.R.
1.05.



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Dated: March 15, 2004